

EXHIBIT A

As stated in Defendant HomeGoods, Inc.'s Notice of Removal, Defendant attaches certified copies of the following documents:

1. Plaintiff's Original Petition, filed April 7, 2021;
2. Request for Process, filed April 8, 2021;
3. Citation to HomeGoods, Inc., filed April 8, 2021;
4. Defendant, HomeGoods, Inc.'s Original Answer, filed April 28, 2021; and
5. Copy Request, filed April 29, 2021.

CAUSE NO. 21-DCV-282329

TONI BEEMAN

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IN THE DISTRICT COURT OF

V.

FORT BEND COUNTY, TEXAS

HOMEGOODS, INC., JOHN DOE
#1, AND JOHN DOE #2Fort Bend County - 458th Judicial District Court
____ JUDICIAL DISTRICT**PLAINTIFF'S ORIGINAL PETITION****TO THE HONORABLE JUDGE OF SAID COURT:**

Plaintiff, **TONI BEEMAN**, files her **ORIGINAL PETITION**, and would show the Court the following:

I.**DISCOVERY LEVEL—II**
AND RULE 194 REQUESTS FOR DISCLOSURE

Discovery and development of this case should occur pursuant to Rule 190.3, TEXAS RULES OF CIVIL PROCEDURE, commonly referred to as Level 2, as may be modified from time to time by agreement of counsel.

Pursuant to the TEXAS RULES OF CIVIL PROCEDURE, Defendants must disclose the information and documents listed in Rule 194.2(b)(1) - (12).

This mandatory discovery must be produced no later than thirty (30) days after the first answer or appearance is filed.





Pursuant to TEXAS RULE OF CIVIL PROCEDURE Rule 99(c) you are advised:

“You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served the citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than thirty (30) days after you file your answer with the clerk. Find out more at www.TexasLawHelp.org.”

II.

PARTIES

Plaintiff, **TONI BEEMAN**, is a resident of Sugar Land, Fort Bend County, Texas.

Defendant, **HOMEGOODS, INC. (“HOMEGOODS”)**, is a foreign corporation, and may be served through its registered agent, CT Corporation System, at 1999 Bryan St., Ste. 900, Dallas, Texas 75201-3136.

Defendant, **JOHN DOE #1**, at all relevant times was an employee of **HOMEGOODS**. Plaintiff has no personal information regarding this Defendants at this time but upon information and belief is a resident of the State of Texas. Plaintiff will learn the identity and location of Defendant **JOHN DOE #1** through discovery.

Defendant, **JOHN DOE #2**, at all relevant times was an employee an employee of **HOMEGOODS**. Plaintiff has no personal information regarding this Defendant at this time but upon information and belief is a resident of the State of Texas. Plaintiff expects to learn the identity and location of Defendant **JOHN DOE #2** through discovery.





III.

FACTS

On or about August 12, 2019, **TONI BEEMAN** purchased a marble-top table (“**TABLE**”) from **HOMEGOODS**’ storefront located at Market @ Town Center, 2545 Town Ctr. North Blvd., Sugar Land, Fort Bend County, Texas 77479.

TONI BEEMAN transported the pre-assembled **TABLE** to the front of the store at which time she completed the purchase.

JOHN DOES #1 and **#2**, employees of **HOMEGOODS**, loaded the table face-down into **TONI BEEMAN**’s vehicle.

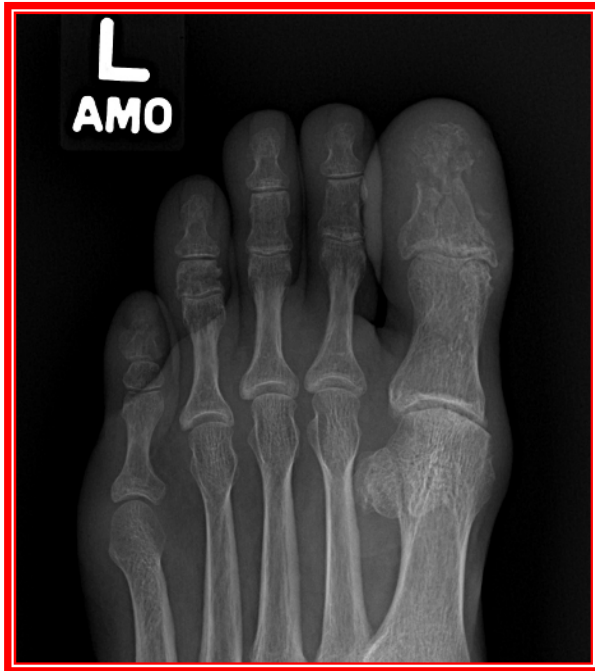
TONI BEEMAN arrived home with her new **TABLE**. When she unloaded the **TABLE** the marble top separated from the wooden base and landed on her left foot.

TONI BEEMAN’s toes were crushed.



DEFECTIVE TABLE (POST-FAILURE)





TONI BEEMAN'S INJURIES





IV.

STRICT PRODUCT LIABILITY—DESIGN, MANUFACTURING, WARNING

The **TABLE** was defective and unsafe inasmuch as it was in a defective condition and unreasonably dangerous as designed, manufactured, and marketed.

HOMEGOODS is liable and accountable pursuant to the doctrine of Strict Liability pursuant to §402A of the RESTATEMENT (SECOND) OF TORTS, which is the substantive law in the State of Texas.

The **DESIGN, MANUFACTURING** and **MARKETING DEFECTS** constituted a producing cause of the occurrence in question and/or injuries and damages suffered by **TONI BEEMAN**.

Design Defect. Pleading further, but not by way of limitation, the **TABLE** was **DEFECTIVELY DESIGNED** in one or more of the following particulars, and others:

- **Deficient and Defective top-to-base ASSEMBLY SYSTEM.**

The foregoing constituted a **DESIGN DEFECT**, which rendered the **TABLE** unreasonably dangerous as designed, taking into consideration the utility of the product and the risk involved in its use.

The **DEFECTIVE DESIGN** constituted a producing cause of the event and/or injuries and damages suffered by **TONI BEEMAN**.

Manufacturing Defect. Pleading further, but not by way of limitation, the **TABLE** was **DEFECTIVELY MANUFACTURED** in one or more of the following particulars:

- **Deficient and Defective top-to-base assembly of TABLE.**





The foregoing constituted a **MANUFACTURING DEFECT**, which rendered the **TABLE** unreasonably dangerous as marketed.

The **DEFECTIVE MANUFACTURING** constituted a producing cause of the event and/or injuries and damages suffered by **TONI BEEMAN**.

Marketing Defect. Pleading further, but not by way of limitation, the **TABLE** was **DEFECTIVELY MARKETED** in one or more of the following particulars:

- **Inadequate WARNINGS and/or INSTRUCTIONS for the assembly of TABLE.**
- **Lack of WARNINGS and/or INSTRUCTIONS provided to Plaintiff upon purchase of TABLE.**

Each of the foregoing, individually or collectively, constituted a **MARKETING DEFECT**, which rendered the **TABLE** unreasonably dangerous as marketed.

The **DEFECTIVE MARKETING** constituted a producing cause of the event and/or injuries and damages suffered by **TONI BEEMAN**.

V.

NEGLIGENT PRODUCT DESIGN, MANUFACTURING AND MARKETING

HOMEGOODS and/or **JOHN DOE #1** and/or **JOHN DOE #2** were **negligent** in the **design, manufacturing, and marketing** of the **TABLE**, which negligence was a proximate cause of the occurrence in question and/or injuries and damages suffered by **TONI BEEMAN**.





VI.

NEGLIGENT ASSEMBLY, INSPECTION, LOADING, WARNINGS,

HOMEGOODS and/or **JOHN DOE #1** and/or **JOHN DOE #2** were **negligent** in the **assembly, inspection, loading, and warnings** relative to the **TABLE**, which negligence was a proximate cause of the occurrence in question and/or injuries and damages suffered by **TONI BEEMAN**.

VII.

ACTUAL DAMAGES

TONI BEEMAN seeks compensation for all elements of damage allowed pursuant to Texas law, including but not limited to the reasonable value of **medical care**, both past and future (as may be adjusted pursuant to Texas law); **physical pain and mental anguish**, both past and future; **physical disfigurement**, both past and future; and **physical impairment**, both past and future.

Actual damages are within the jurisdictional limits of this Court.

Pursuant to Rule 47(c) TONI BEEMAN seeks monetary relief in excess of \$250,000 but not more than \$1,000,000.

VIII.

JURY DEMAND

TONI BEEMAN respectfully demands a jury.

IX.

PRE-JUDGMENT AND POST JUDGMENT INTEREST

TONI BEEMAN seeks pre- and post-judgment interest as allowed by law.





WHEREFORE, PREMISES CONSIDERED, TONI BEEMAN prays **HOME GOODS, INC., JOHN DOE #1 and JOHN DOE #2** be Cited and required to Answer and appear herein, and that upon a trial of the merits, Judgment for actual damages, pre-judgment and post-judgment interest, and taxable costs be entered in favor of **TONI BEEMAN** against Defendants, jointly and severally.

TONI BEEMAN further prays for any and all further relief, both general and special, at law or in equity, to which she may show herself justly entitled.

Respectfully submitted,

THE WEST LAW FIRM

S. SCOTT WEST

SBN: 21206920

MADDISON M. WEST

SBN: 24104633

ROBERT C. GOODWILL, JR.

SBN: 24096785

6908 BRISBANE COURT

THIRD FLOOR

SUGAR LAND, TEXAS 77479

TEL: (281) 277-1500

FAX: (281) 277-1505

WestTeam@westfirm.com

ATTORNEYS FOR PLAINTIFF

I, Beverley McGrew Walker, District Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true, correct and full copy of the Instrument herein set out and appears of record in The District Court of Fort Bend County, Texas. This 30 day of APRIL 2021



BEVERLEY MCGREW WALKER, DISTRICT CLERK
By **ASHLEY ALANIZ** Deputy

**BEVERLEY MCGREW WALKER**
Fort Bend County District Clerk
301 Jackson Street, Room 101
Richmond, TX 77469Telephone: (281) 341-4509
Fax: (281) 341-4519**REQUEST FOR PROCESS****All sections must be completed for processing this request.****Section 1:**Cause No. 21-DCV-282329STYLE: Toni Beeman VS HomeGoods, Inc.**Section 2:****Check Process Type:**

- | | |
|---|---|
| <input checked="" type="checkbox"/> Citation | <input type="checkbox"/> Precept to Serve / Notice of Hearing |
| <input type="checkbox"/> Citation by Posting | <input type="checkbox"/> Citation by Commissioner of Insurance |
| <input type="checkbox"/> Temporary Restraining Order | <input type="checkbox"/> Notice of Registration of Foreign Judgment |
| <input type="checkbox"/> Citation by Secretary of State | <input type="checkbox"/> Writ of _____ |

☐ Application for Protective Order / Temporary (Ex Parte) Protective Order☐ Citation by Publication*:☐ **Daily:** Fort Bend Herald☐ **Once a Week:** Fort Bend Independent☐ **Other:** _____

* In Accordance with the Fort Bend County Term Contract for Newspaper Publication of Legal Notices

☐ Other _____☐ TCPRC 17.032 Citation by Publication (*Citation will be posted by the District Clerk's Office on the Office of Court Administration website*)**REQUEST FOR ISSUANCE OF SUBPOENA MUST BE SUBMITTED ON A
SUBPOENA APPLICATION FORM****Section 3:****Title of Document/Pleading to be attached for service:** _____Plaintiff's Original Petition**Section 4: PARTIES TO BE SERVED (Please type or print):**1. Name: HomeGoods, Inc. c/o CT Corporation SystemAddress: 1999 Bryan Street, Suite 900City: Dallas State: Texas Zip: 75201-3136

2. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

3. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

4. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Section 5**Check Service Type – Additional Fees Apply:**

- ☐ Fort Bend County – Constable* ☐ District Clerk Service**
☐ Fort Bend County – Sheriff* ☐ Certified Mail
☐ Registered Mail (Out of Country) ☒ Not Applicable – See Section 7

* Fort Bend County Constable and Sheriff will only serve within their jurisdiction.** Fort Bend County District Clerk's Office will only conduct service on Citation by Publications posted on the Office of Court Administration website.**Section 6 (ONLY if Section 7 does not apply)****Please Note:** Our office will use the e-Service email address registered with the Texas State Bar.**Attorney Name:** S. Scott West

Address: 6908 Brisbane Court, Third Floor

Sugar Land	Street/P.O. Box	Texas	77479
City	State	Zip	

Telephone No. 281.277.1500 Bar No. 21206920

Section 7 (ONLY if Section 6 does not apply)**Pro-Se Name:** _____

Address: _____

_____	Street/P.O. Box	_____	_____
City	State	Zip	

Telephone No. _____ Email Address _____

Pro-se Service Only:

- ☒ e-Service* ☐ Mail to Pro-se Party*

*Service will be mailed/emailed directly to pro-se party requesting issuance.

I, Beverley McGrew Walker, District Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true, correct and full copy of the instrument hereby set out and appears to record in The District Court of Fort Bend County, Texas. This 30 day of APRIL 2021



BEVERLEY MCGREW WALKER, DISTRICT CLERK
By ASHLEY ALANIZ Deputy

Ashley Alaniz

**SERVICE FEE NOT COLLECTED
BY DISTRICT CLERK**

THE STATE OF TEXAS

CITATION

**TO: HOMEGOODS, INC.
REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN ST STE 900
DALLAS TX 75201-3136**

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on Monday next following the expiration of twenty days after you were served this citation and **PLAINTIFF'S ORIGINAL PETITION** filed on **April 07, 2021**, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

The case is presently pending before the **458TH JUDICIAL DISTRICT COURT** of Fort Bend County sitting in Richmond, Texas. It bears cause number **21-DCV-282329** and is styled:

TONI BEEMAN VS HOMEGOODS, INC., JOHN DOE #1, AND JOHN DOE #2

The name and address of the attorney for **PLAINTIFF(S)** is:

**S SCOTT WEST
THE WEST LAW FIRM
6908 BRISBANE COURT THIRD FLOOR
SUGAR LAND TX 77479
(281) 277-1500**

The nature of the demands of said **PLAINTIFF(S)** is shown by a true and correct copy of the **PLAINTIFF'S ORIGINAL PETITION** accompanying this citation and made a part hereof.

If this Citation is not served, it shall be returned unserved. Issued under my hand and seal of said Court, at Richmond, Texas, **on this the 8th day of April, 2021.**

**DISTRICT CLERK BEVERLEY MCGREW WALKER
FORT BEND COUNTY, TEXAS**

Physical Address:

1422 Eugene Heimann Circle, Room 31004
Richmond, Texas 77469

Mailing Address:

301 Jackson Street, Room 101
Richmond, Texas 77469

By: _____

Justyce Turner
Deputy District Clerk JUSTYCE TURNER
Telephone: (281) 344-3919



21-DCV-282329

458th Judicial District Court

Toni Beeman vs Homegoods, Inc., John Doe #1, and John Doe #2

OFFICER'S OR AUTHORIZED PERSON'S RETURN

Came to hand on the _____ day of _____, 20__, at _____ o'clock ____M. Executed at _____, within the County of _____, at _____ o'clock ____M. on the _____ day of _____, 20__, by delivering to the within named _____, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

Total fee for serving ____ citation at \$80.00 each \$_____

Name of Officer or Authorized Person

County, Texas

By: _____
Signature of Deputy or Authorized Person

*State day and hour and place of serving each person.

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable, or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

"My name is _____,
(First, Middle, Last)

my date of birth is _____, and my address is _____
(Street, City, Zip)

_____,

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____

day of _____.

Declarant / Authorized Process Server

(Id # & expiration of certification)

ORIGINAL

Citation issued to Homegoods, Inc. on 4/8/2021.



**SERVICE FEE NOT COLLECTED
BY DISTRICT CLERK**

THE STATE OF TEXAS

CITATION

**TO: HOMEGOODS, INC.
REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN ST STE 900
DALLAS TX 75201-3136**

NOTICE:

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TONI BEEMAN VS HOMEGOODS, INC., JOHN DOE #1, AND JOHN DOE #2

The name and address of the attorney for **PLAINTIFF(S)** is:

**S SCOTT WEST
THE WEST LAW FIRM
6908 BRISBANE COURT THIRD FLOOR
SUGAR LAND TX 77479
(281) 277-1500**

The nature of the demands of said **PLAINTIFF(S)** is shown by a true and correct copy of the **PLAINTIFF'S ORIGINAL PETITION** accompanying this citation and made a part hereof.

If this Citation is not served, it shall be returned unserved. Issued under my hand and seal of said Court, at Richmond, Texas, **on this the 8th day of April, 2021.**

**DISTRICT CLERK BEVERLEY MCGREW WALKER
FORT BEND COUNTY, TEXAS**

Physical Address:

1422 Eugene Heimann Circle, Room 31004
Richmond, Texas 77469

Mailing Address:

301 Jackson Street, Room 101
Richmond, Texas 77469

By: 

**Deputy District Clerk JUSTYCE TURNER
Telephone: (281) 344-3919**



SERVICE



21-DCV-282329

458th Judicial District Court

Toni Beeman vs Homegoods, Inc., John Doe #1, and John Doe #2

OFFICER'S OR AUTHORIZED PERSON'S RETURN

Came to hand on the _____ day of _____, 20__, at _____ o'clock ____M. Executed at _____, within the County of _____, at _____ o'clock ____M. on the _____ day of _____, 20__, by delivering to the within named _____, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

Total fee for serving ____ citation at \$80.00 each \$_____

Name of Officer or Authorized Person

County, Texas

By: _____
Signature of Deputy or Authorized Person

*State day and hour and place of serving each person.

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable, or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

"My name is _____,
(First, Middle, Last)

my date of birth is _____, and my address is _____
(Street, City, Zip)

."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____
day of _____.

Declarant / Authorized Process Server

(Id # & expiration of certification)

SERVICE

Citation issued to Homegoods, Inc. on 4/8/2021.

I, Beverley McGrew Walker, District Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true, correct and full copy of the instrument herein set out and appears of record in The District Court of Fort Bend County, Texas. This 30 day of APRIL 2021



BEVERLEY MCGREW WALKER, DISTRICT CLERK
By ASHLEY ALANIZ Deputy

Ashley Alaniz

CAUSE NO. 21-DCV-282329

TONI BEEMAN	§	IN THE DISTRICT COURT OF
	§	
VS.	§	FORT BEND COUNTY, TEXAS
	§	
HOMEGOODS, INC.,	§	
JOHN DOE #1, AND JOHN DOE #2	§	458TH JUDICIAL DISTRICT

ORIGINAL ANSWER OF DEFENDANT HOMEGOODS, INC.

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, HOMEGOODS, INC., Defendant in the above-entitled and numbered cause, and in answer to Plaintiff's Original Petition, would respectfully show unto the Court as follows:

I.
GENERAL DENIAL

Defendant denies each and every, singular and all, the allegations contained in Plaintiff's Petition, says that the allegations therein are not true, either in whole or in part, and demands strict proof thereof.

II.
AFFIRMATIVE DEFENSES

1. Defendant seek the jury submission of Plaintiff's comparative responsibility pursuant to Chapters 32 and 33 of the Texas Civil Practice & Remedies Code.
2. Plaintiff's damages, if any, are limited to only those damages actually paid on behalf of Plaintiff pursuant to § 41.0105 of the Tex. Civ. Prac. & Rem. Code.
3. Pleading further, alternatively, and by way of affirmative defense, Defendant would show, in the unlikely event that any liability is found on the part of the Defendant, that such liability be reduced by the percentage of the causation found to have resulted from the acts or omissions of any other third parties.



4. Pleading further, alternatively, and by way of affirmative defense, Defendant would state that in the unlikely event that an adverse judgment would be rendered against it, Defendant would respectfully request all available credits and/or offsets as provided by the Texas Civil Practice and Remedies Code and under Texas law.

5. Pleading further, and in the alternative, if such is necessary, and subject to the foregoing pleas and without waiving same, this action is subject to the proportionate responsibility provisions of Chapter 33 of the TEXAS CIVIL PRACTICE AND REMEDIES CODE, including (without limitation) the requirement of § 33.003, thereof that the trier of fact determine the relative responsibility of the Plaintiff, and responsible third parties.

6. Pleading further, alternatively, and by way of affirmative defense, Defendant would show that any claims for medical or health care expenses must be limited to the amounts actually paid or incurred by or on behalf of Plaintiff pursuant to TEX. CIV. PRAC. & REM. CODE § 41.0105.

7. Pleading further, alternatively, and by way of affirmative defense, Defendant would show that, pursuant to Section 18.091 of the TEX. CIV. PRAC. & REM. CODE, to the extent that Plaintiff is seeking recovery for loss of earnings, lost wages, loss of earning capacity, and/or loss of contributions of pecuniary value, evidence of this alleged loss must be presented by Plaintiff in the form of a net loss after reduction for income tax payments, or unpaid tax liability to any federal income tax law.

8. Pleading further, alternatively, and by way of affirmative defense, Defendant invokes limitations on interest, both prejudgment and post-judgment, contained in Chapter 304 of the TEX. FIN. CODE. Prejudgment interest on alleged future damages, if any, may not be assessed or recovered.



9. Pleading further, alternatively, and by way of affirmative defense, Defendant has no actual or constructive notice of any premise defect or other unreasonably dangerous condition in connection with the alleged incident.

10. Defendant further pleads that pursuant to Chapter 82, TEX. CIV. PRAC. & REM. CODE, Defendant is a nonmanufacturing seller and avails itself of the provisions of that statute as it applies to the facts of this incident.

III.
JURY DEMAND

11. Defendant respectfully demands a jury for the trial of this matter, and hereby tenders the jury fee.

IV.
DIRECTED COMMUNICATION

12. Forward all communications regarding this matter to Kevin B. Tompkins at ktompkins@hartlinebarger.com; Jenni Fann at jfann@hartlinebarger.com, and Catrina Edling at cedling@hartlinebarger.com. Failure to include all requested individuals referenced above in all communications, notices, and filings, shall be deemed inadequate service.

WHEREFORE, PREMISES CONSIDERED, Defendant, HOMEGOODS, INC., prays that Plaintiff take nothing by reason of this suit, that Defendant be discharged, and that it go hence with its costs, and for all such other and further relief, both general and special, at law and in equity, to which Defendant may show itself to be justly entitled.



Respectfully submitted,

HARTLINE BARGER LLP

/s/ Kevin B. Tompkins

Kevin B. Tompkins
State Bar No. 20125690
Marshall G. Rosenberg
State Bar No. 12771450
1980 Post Oak Blvd., Suite 1800
Houston, Texas 77056
Telephone: 713-759-1990
Facsimile: 713-652-2419
ktompkins@hartlinebarger.com
mrosenberg@hartlinebarger.com

**ATTORNEYS FOR DEFENDANT
HOMEGOODS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served upon the parties listed below by the method(s) indicated on the 28th day of April, 2021.

S. Scott West
The West Law Firm
6908 Brisbane Court, 3rd Floor
Sugar Land, Texas 77479
via electronic service: WestTeam@westfirm.com

/s/ Kevin B. Tompkins

Kevin Tompkins

I, Beverley McGrew Walker, District Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true, correct and full copy of the Instrument herein set out and appears of record in The District Court of Fort Bend County, Texas. This 30 day of APRIL, 2021



BEVERLEY MCGREW WALKER, DISTRICT CLERK
By ASHLEY ALANIZ Deputy

Ashley Alaniz

**HARTLINE
BARGER** LLP

Dallas
Houston
Corpus Christi
Albuquerque
Santa Fe
Waco

1980 Post Oak Blvd.
Suite 1800
Houston, Texas 77056
T: 713.759.1990
F: 713.652.2419

Filed
Beverley McGrew Walker
District Clerk
Fort Bend County, Texas
Norma Sosa

April 29, 2021

Ms. Beverley McGrew Walker
Fort Bend County District Clerk
301 Jackson St., Room 101
Richmond, Texas 77469

Re: Cause No. 21-DCV-282329; *Toni Beeman vs. HomeGoods, Inc., et al*; In the
458th Judicial District Court of Fort Bend County, Texas

Dear Ms. Walker:

Please obtain **certified copies** of the following documents, including the docket sheet/case summary sheet, in the above referenced cause:

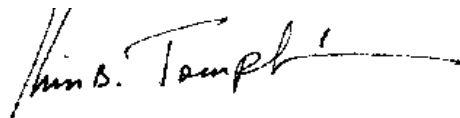
1. 4/7/2021 Plaintiff's Original Petition (8 pages);
2. 4/8/2021 Request for Process (2 pages);
3. 4/8/2021 Citation – HomeGoods, Inc. (4 pages);
4. 4/28/2021 Original Answer – HomeGoods, Inc. (4 pages); and
5. Court's Docket Sheet (2 pages).

Total of 20 pages.

Please return the certified copies to my legal assistant, Catrina Edling by email at cedling@hartlinebarger.com.

If you have any questions, feel free to contact Catrina 713-951-4257.

Very truly yours,



Kevin B. Tompkins

KBT/ce

I, Beverley McGrew Walker, District Clerk of Fort Bend County, Texas, do hereby certify that the foregoing is a true, correct and full copy of the instrument herein set out as appears of record in The District Court of Fort Bend County, Texas. This 30 day of APRIL 20 21



BEVERLEY MCGREW WALKER, DISTRICT CLERK
By ASHLEY ALANIZ Deputy

